## BARRY GROUP INTERNATIONAL, INC.

1551 Holly Boulevard Manasquan, New Jersey 08735 (732) 528-1428

## VIA ELECTRONIC FILING

Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re:

Annual Section 64.2009(e) CPNI Certification for CY 2009

EB DOCKET 06-36 Filed March 1, 2010

Barry Group International, Inc.

499 Filer ID 827609 FRN 0017870148

Signatory: Manel AbdelBarry, Vice-President

## CERTIFICATION

I, Manel AbdelBarry, hereby certify that I am a duly authorized officer of Barry Group International, Inc. ("BGI"), authorized as an agent to make this filing, and that I have personal knowledge that BGI has established operating procedures that are adequate to ensure compliance with the FCC's CPNI rules. See 47 C.F.R. Section 64.2001 et.seq.

Attached hereto is an accompanying statement explaining how BGI's procedures ensure that BGI is in compliance with the requirements set forth in Section 64.2001 *et.seq.* of the FCC's rules.

BGI has not taken any actions (proceedings instituted or petitions filed by BGI at either state commissions, the court system, or at the FCC) against data brokers in the past year. BGI acknowledges that companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

BGI has not received any customer complaints in the past year concerning the unauthorized release of CPNI. BGI represents that this certification is truthful and factual in accordance with the standards set forth in Section 1.17 of the Commission's rules and acknowledges that false statements or misrepresentations are subject to punishment and sanction.

3/1/2010

Dated

Manel AbdelBarry

Vice-President

Barry Group International, Inc.

## BARRY GROUP INTERNATIONAL, INC. - CPNI COMPLIANCE STATEMENT

Barry Group International, Inc. ("BGI") operates its facilities in a manner that ensures adherence to the rules of the Federal Communications Commission relating to the handling of customer proprietary network information ("CPNI") requiring the protection of CPNI and the prompt reporting of any circumstances or events in which the security of CPNI may have been breached or compromised.

- BGI has adopted the Commission's Small Entity CPNI Compliance Guide as its CPNI
  manual and ensures that it is appropriately updated with CPNI rule revisions and has
  designated Manel Barry as the CPNI compliance officer to supervise and enforce the
  implementation of CPNI protective measures and mandated reporting.
- BGI trains all persons under its control with respect to the proper handling of CPNI and the security requirements relating thereto based on the materials referenced in Item #1 above.
- 3. BGI has not, during the reporting period, utilized any CPNI data in connection with any sales or marketing campaigns. However, it is BGI's policy that should such sales or marketing campaigns ever be initiated in the future, it will utilize a system in which the status of a customer's CPNI approval can be determined prior to its use.
- 4. It is further BGI's policy to maintain a record of any instance or circumstance in which CPNI under the control of BGI is disclosed or furnished to third parties, or where third parties are granted access to CPNI. This record is to include a description of each sales or marketing campaign and the identity of products or services that are offered as a part of such campaign.
- 5. BGI has a supervisory review process for compliance with the recordkeeping associated with any sales or marketing campaign that utilizes CPNI and requires the maintenance of such records for a minimum period of one year. In the event sales or marketing

campaigns should be undertaken that make use of CPNI data, any person so engaged is required to make sure that opt-out elections are properly recorded and followed.

- BGI has procedures in place to notify law enforcement and all affected customers of the unauthorized disclosure of CPNI in accordance with the time limits imposed by the FCC.
- 7. BGI took no actions against data brokers or "pretexters" during the reporting period (2009), including, without limitation, any proceedings initiated by BGI at the FCC, any state public utility commission or in any court system.
- 8. BGI has determined that no data broker or "pretexter" has attempted to access CPNI on any portion of its system.
- 9. The following is a summary of customer complaints received during the reporting period relating to the unauthorized release of CPNI:

Number of customer complaints: Zero

Number of instances of improper access by employees: Zero

Number of instances of improper disclosure to unauthorized persons: Zero

Number of instances of improper access to online information

by unauthorized persons: Zero

Number of other instances of improper access or disclosure: Zero

Description of instances of improper access or unauthorized disclosure: Zero